

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND

ELEV8 BALTIMORE, INC., et al.
Plaintiffs,

v.

CORPORATION FOR NATIONAL AND
COMMUNITY SERVICE, *operating as*
AMERICORPS, et al.

Defendants.

Case No. 1:25-cv-01458-MJM

PLAINTIFFS' MOTION FOR LEAVE TO SUPPLEMENT THE RECORD

Plaintiffs respectfully move for leave to supplement the record to include additional declarations addressing Defendants' actions vis-à-vis Judge Boardman's preliminary injunction order issued June 5, 2025. *See Maryland v. Corp. for Nat'l & Comm. Serv. (AmeriCorps)*, No. 1:25-cv-1363 (D. Md. June 5, 2025).

Plaintiffs filed this litigation on May 5, 2025. ECF No. 1. Given the extraordinary harm, Plaintiffs moved for a preliminary injunction on May 19, 2025. ECF No. 25. In the meantime, on June 5, 2025, Judge Boardman granted a preliminary injunction in *Maryland v. Corp. for Nat'l & Comm. Serv.*, No. 1:25-cv-1363 (D. Md. June 5, 2025), another case—filed on behalf of twenty-four states and the District of Columbia—challenging Defendants' actions. Plaintiffs wish to update their declarations reflecting new facts that have come to light in the days following Judge Boardman's decision for AmeriCorps employees, grantees, and participants. Accordingly, Plaintiffs respectfully move for leave to supplement the record with these declarations.

These declarations are attached as exhibits hereto. Counsel for Plaintiffs has conferred with counsel for the Defendants and Defendants do not oppose this motion. A proposed order is

attached.

Dated: June 16, 2025

/s/ Norman L. Eisen

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Respectfully submitted,

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* Application for admission or admission pro hac vice pending.

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that on this 16th day of June, 2025, I electronically served Plaintiffs' Motion for Leave to Supplement the Record and all accompany documents with the Clerk of the Court for the United States Court of the District of Maryland by using the CM/ECF system.

/s/ Norman L. Eisen
Norman Eisen [Bar No. 09460]